

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ECLIPSE LIQUIDITY, INC.

Plaintiff,

v.

AVOR NAVIGATION LTD.; ADVANTAGE
ARROW SHIPPING, LLC; GENEL DENIZCILIK
NAKLIYATI A.S. A/K/A GEDEN LINES;
ADVANTAGE TANKERS, LLC; ADVANTAGE
HOLDINGS, LLC; and FORWARD HOLDINGS,
LLC,

Defendants.

No. 4:15-CV-1645
ADMIRALTY

**ATTORNEY DECLARATION THAT DEFENDANTS
CANNOT BE FOUND IN THE DISTRICT**

Pursuant to 28 U.S.C. § 1746, this declaration is executed by George A. Gaitas, counsel for Plaintiff, ECLIPSE LIQUIDITY, INC., in order to secure the issuance of a Summons and Process of Maritime Attachment and Garnishment in the above-captioned Admiralty Cause. I George A. Gaitas, declare under the penalty of perjury:

I am a Member of the firm of CHALOS & CO, P.C., attorneys for Plaintiff in the above referenced matter.

I am familiar with the circumstances of the Original Verified Complaint, and I submit this declaration in support of Plaintiff's request for the issuance of Process of Maritime Attachment and Garnishment of the property of the Defendants, AVOR NAVIGATION LTD. (hereinafter "NAVIGATION"); ADVANTAGE ARROW SHIPPING, LLC (hereinafter "ARROW SHIPPING"); GENEL DENIZCILIK NAKLIYATI A.S. A/K/A GEDEN LINES (hereinafter "GEDEN"); ADVANTAGE TANKERS, LLC (hereinafter "ADVANTAGE

TANKERS”); ADVANTAGE HOLDINGS, LLC (hereinafter “ADVANTAGE HOLDINGS”); and FORWARD HOLDINGS, LLC (hereinafter “FORWARD HOLDINGS”), pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

I have personally inquired or have directed inquiries into the presence of the Defendants in this District.

I have directed attorneys in my firm to check with the office of the Texas Secretary of State, using the Secretary of State’s database, to determine whether the Defendants can be located within this District. NAVIGATION, ARROW SHIPPING, GEDEN, ADVANTAGE TANKERS, ADVANTAGE HOLDINGS, and FORWARD HOLDINGS are not registered with the Texas Secretary of State. Accordingly, I have determined that, as of June 10, 2015, none of these Defendants are incorporated or registered as foreign corporations pursuant to the laws of Texas, and have neither nominated nor appointed any agent for the service of process within this District.

I have directed attorneys in my firm to engage a search of the Superpages telephone directory on the internet, and determined that there are no telephone listings or addresses for the Defendants within this District.

I have directed attorneys in my firm to engage in a Google search as to whether the Defendants can be located within this District. The Google search results did not provide a listing for any of the named Defendants.

I am unaware of any general or managing agent(s) of the named Defendants within this District.

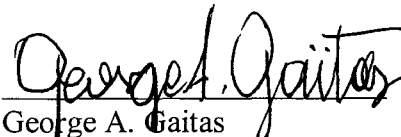
In that I have been able to determine that the Defendants have not appointed an agent for service of process within the Southern District of Texas and that I have found no indication that the Defendants can be found within this District for the purposes of Rule B, I have formed a good faith belief based on the investigation of the attorneys under my direction that the Defendants do not have sufficient contacts or business activities within this District and do not have any offices or agents within this District to defeat maritime attachment under Rule B of the Supplemental Rules for Admiralty and Maritime Claims as set forth in the Federal Rules of Civil Procedure.

It is my belief, based upon an investigation performed by attorneys in my firm under my direction that the Defendants cannot be found within this District for the purposes of Rule B of the Supplemental Rules of Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

Date: June 10, 2015
Houston, TX

Respectfully Submitted,

CHALOS & CO, P.C.

By: 
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ECLIPSE LIQUIDITY, INC.

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FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ECLIPSE LIQUIDITY, INC.	§	
Plaintiff,	§	No. 4:15-CV-_____
	§	
v.	§	ADMIRALTY
	§	
AVOR NAVIGATION LTD.; ADVANTAGE	§	
ARROW SHIPPING, LLC; GENEL DENIZCILIK	§	
NAKLIYATI A.S. A/K/A GEDEN LINES;	§	
ADVANTAGE TANKERS, LLC; ADVANTAGE	§	
HOLDINGS, LLC; and FORWARD HOLDINGS,	§	
LLC,	§	
	§	
Defendants.	§	

VERIFICATION OF COMPLAINT

Pursuant to 28 U.S.C. §1746, Despoina Bacha, declares under the penalty of perjury:

1. I am an individual of sound mind, and have never been convicted of a crime of moral turpitude.

2. I am a citizen of Greece and a resident of Athens and a lawful representative of the Plaintiff in the above action and duly authorized on its behalf to make this verification.

3. I have read the foregoing Verified Complaint and exhibits thereto and know the contents thereof; and

I declare under penalty of perjury that the foregoing is true and correct.

Signed in Athens, Greece this 10th day of June 2015

A handwritten signature in black ink, appearing to read 'Despoina', followed by a horizontal line.

Despoina Bacha